

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

<b>STONI SMITH,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No.: 3:13-CV-05007-SWH</b>
	)	
<b>v.</b>	)	
	)	
<b>SANTANDER CONSUMER USA, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**NOTICE OF REMOVAL TO ADVERSE PARTY**

TO: David Sims  
SIMS, JOHNSON, WOOD & SIMS  
119 South Washington  
P.O. Box 276  
Neosho, Missouri 64850  
*Attorney for Plaintiff*

Pursuant to 28 U.S.C. § 1446(d), Defendant Santander Consumer USA, Inc. respectfully gives written notice to you that a Notice of Removal has been filed in the above captioned matter and that the Notice of Filing of this removal was filed with the Circuit Court of Newton County, Missouri. A copy of the Notice filed in the Circuit Court of Newton County, Missouri (as Exhibit A) and a copy of the Notice filed in the United States District Court for the Western District of Missouri (as Exhibit B) are attached hereto.

SUBMITTED this 17th day of January, 2013.

Respectfully submitted,

**ZERGER & MAUER LLP**

By: /s/ Melody L. Rayl

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ATTORNEYS FOR DEFENDANT  
SANTANDER CONSUMER USA INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the \_\_\_\_ day of January, 2013, a true and correct copy of the foregoing was filed by CM/ECF and mailed, U.S. first class postage prepaid, to:

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/s/ Melody L. Rayl  
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